

Koch, Kristine

From: MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Sent: Monday, March 16, 2015 5:11 PM
To: Koch, Kristine
Subject: Please Read Prior to LWG Meeting - Mn PRG Issue

Hi Kristine,

It is our understanding that EPA has accepted the LWG hardness methodology for RAO 8. Note that Table 2-2-1 (recent PRG table) does not footnote this methodology and still retains the 120 ug/L value for Mn. This may be one of the reasons that the LWG has identified it for discussion.

DEQ Cleanup has been working on internal guidance for project managers on issues associated with Mn. For example, when to look for it, what the risk #s are, etc. With the exception of wanting to match up the Portland Harbor PRGs with the risk values identified by our work group, the effort is not Portland Harbor related. One of the team members recently observed an issue with data utilized by Windward in one of the studies supporting the updated hardness equation. In this instance it appears that the hardness of the dilution water was carried forward as the hardness of the test solution. The actual water hardness for the tests in the paper ranged from 112 to 220 ppm rather than the 90 reported by Windward. This error would lead to an overestimation of the mitigation effects of hardness of Mn toxicity. We have not pursued this beyond the single paper to ascertain if it was a single error or more systemic. The question did generate some additional questions about the data quality.

The DEQ Mn work group concluded that it would not be able to support the Windward hardness algorithm without some additional documentation. I realize that this decision may already be behind us with the LWG, but since the comment period is open I wanted to check in with you as to the most constructive way to raise this issue. Ideally, DEQ's programmatic guidance would be consistent with the PRG. Let's plan on discussing tomorrow afternoon if you get a chance.

Regards,

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This spring, DEQ's Northwest Region Office will be moving to a new location - the 700 Lloyd Building at 700 NE Multnomah St., Suite #600, Portland, OR 97232. The target date for operating at the new location is May 26th, 2015.